

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

|   |   |
|---|---|
| WSOU INVESTMENTS, LLC d/b/a<br>BRAZOS LICENSING AND<br>DEVELOPMENT,<br><br><p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p style="text-align: center;">GOOGLE LLC,</p> <p style="text-align: center;">Defendant.</p> | Case No. 6:20-cv-00571-ADA<br>Case No. 6:20-cv-00572-ADA<br>Case No. 6:20-cv-00573-ADA<br>Case No. 6:20-cv-00574-ADA<br>Case No. 6:20-cv-00575-ADA<br>Case No. 6:20-cv-00576-ADA<br>Case No. 6:20-cv-00577-ADA<br>Case No. 6:20-cv-00578-ADA<br>Case No. 6:20-cv-00579-ADA<br>Case No. 6:20-cv-00580-ADA<br>Case No. 6:20-cv-00581-ADA<br>Case No. 6:20-cv-00582-ADA<br>Case No. 6:20-cv-00583-ADA<br>Case No. 6:20-cv-00584-ADA<br>Case No. 6:20-cv-00585-ADA<br><br><p style="text-align: center;"><b>JURY TRIAL DEMANDED</b></p> |
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**JOINT CASE READINESS STATUS REPORT**

**TO THE HONORABLE COURT:**

Plaintiff WSOU Investments, LLC and Defendant Google LLC, hereby provide the following status report in advance of the initial Case Management Conference (CMC).

**FILING AND EXTENSIONS**

Plaintiff WSOU filed a complaint in each of the above-numbered cases on June 29, 2020. There has been one extension for a total of 45 days in all cases except in *WSOU Investments LLC v. Google LLC*, No. 6:20-cv-00571; in that case, there were two extensions for a total of 45 days; a first extension for 45 days, and a second extension after WSOU filed a first amended complaint on August 5, 2020, covering the same period and ensuring that Google's Rule 12 responses all fell on the same day.

**RESPONSES TO THE COMPLAINTS**

Defendant filed an answer in the following cases on September 11, 2020: -00571, -00572, -00573, -00574, -00576, -00578, -00579, -00581, -00582, -00583, and -00584.

**PENDING MOTIONS**

Defendant filed a motion to dismiss pursuant to Rule 12(b)(6) in the following cases on September 11, 2020: -00575, -00577, -00580, and -00585. There are no other pending motions.

**RELATED CASES IN THIS JUDICIAL DISTRICT**

The above-numbered cases were all filed by Plaintiff against Defendant in this District. There are no known related cases.

**IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

**NUMBER OF ASSERTED PATENTS AND CLAIMS**

Based on the current understanding of Defendant's products, Plaintiff intends to assert in the infringement contentions the following number of claims:

| Case   | Number of Patents | Number of Claims |
|--------|-------------------|------------------|
| -00571 | 1                 | 9                |
| -00572 | 1                 | 14               |
| -00573 | 1                 | 5                |
| -00574 | 1                 | 21               |
| -00575 | 1                 | 12               |
| -00576 | 1                 | 7                |
| -00577 | 1                 | 20               |
| -00578 | 1                 | 4                |

|        |   |    |
|--------|---|----|
| -00579 | 1 | 26 |
| -00580 | 1 | 41 |
| -00581 | 1 | 12 |
| -00582 | 1 | 4  |
| -00583 | 1 | 5  |
| -00584 | 1 | 5  |
| -00585 | 1 | 6  |

### **APPOINTMENT OF TECHNICAL ADVISOR**

The parties are discussing whether appointment of a technical adviser would be beneficial and will so advise the Court in the coming weeks.

### **MEET AND CONFER STATUS**

The parties raise the following pre-*Markman* issues:

***Conduct of Markman Hearing*** – the parties understand that the Court has scheduled these cases for *Markman* on March 25-26, 2021. The parties are meeting and conferring and will make a proposal to the Court for orderly presentation of the claim construction issues presented in the above-numbered cases over the two days allocated for hearing.

***Protective Order*** – the parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming days.

Date: October 2, 2020

Respectfully submitted,

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